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Attorneys for Individual and Representative Plaintiffs

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ERIC HALVORSON, LAURA FERRER, PETER  
DALLMAN, ROBERT GRANA, DENNIS  
BULCAO, and NEIL YOUNG, individually, as  
representatives of the classes, and on behalf of the  
general public,

Plaintiffs,

v.

TALENTBIN, INC.,

Defendant.

Case No. 3:15-cv-05166-JCS

**STIPULATION TO EXTEND  
TIME FOR FILING MOTION  
FOR PRELIMINARY  
APPROVAL OF CLASS ACTION  
SETTLEMENT AND CONTINUE  
CASE MANAGEMENT  
CONFERENCE**

1 Pursuant to Civil Local Rule 6-1(b), plaintiffs Eric Halvorson, Laura Ferrer, Peter  
2 Dallman, Robert Grana, Dennis Bulcao, and Neil Young (“Plaintiffs”) and defendant TalentBin,  
3 Inc. (“Defendant”), through their undersigned counsel, hereby stipulate as follows:

4 WHEREAS, on August 19, 2016, the parties filed a Notice of Settlement and Stipulation  
5 to Vacate Litigation Deadlines;

6 WHEREAS, the Court extended the time for filing a motion for preliminary approval  
7 from September 19, 2016 to October 19, 2016 pursuant to the parties’ stipulation of September  
8 13, 2016;

9 WHEREAS, the Court set a Case Management Conference for October 28, 2016 at 2pm;

10 WHEREAS, the parties have encountered technical difficulties in the production of  
11 confirmatory discovery materials required to finalize the settlement agreement resulting in  
12 unanticipated delay;

13 WHEREAS, Defendant has committed to providing Plaintiffs with the confirmatory  
14 discovery materials no later than October 21, 2016;

15 WHEREAS, given the nature and format of these materials, Plaintiffs require  
16 approximately five business days to process the confirmatory discovery materials before  
17 analyzing them;

18 WHEREAS, the parties are near to executing, but have not yet executed a formal  
19 settlement agreement memorializing the terms agreed to at mediation due to this delay;

20 WHEREAS, the parties agree that they require 28 days to complete the confirmatory  
21 discovery, to execute the settlement agreement, and to prepare a motion for preliminary approval;

22 WHEREFORE, the parties request that the Court extend the deadline to file for  
23 preliminary approval to November 16, 2016 and continue the Case Management Conference until  
24 a date thereafter that is convenient for the Court.

25 Pursuant to Local Rule 6-1(b), the parties request that the deadline for filing for preliminary  
26 approval be extended to November 16, 2016 and continue the Case Management Conference to a  
27 date thereafter that is convenient for the Court.

1 Dated: October 17, 2016

MORRISON & FOERSTER LLP

2  
3 By: /s/ Angela E. Kleine  
4 Angela E. Kleine

5 Attorneys for Defendant  
6 TALENTBIN, INC.

7 Dated: October 17, 2016

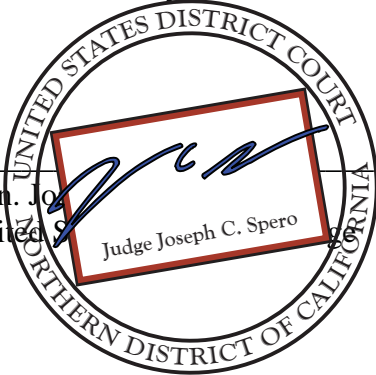
BERGER & MONTAGUE, P.C.

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9 By: /s/ John G. Albanese  
10 John G. Albanese

11 Attorneys for Plaintiffs

12 **IT IS SO ORDERED.**

13 Date: 10/20/16

14 Hon. Jo  
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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1**

I, John G. Albanese, am the ECF User filing this STIPULATION TO EXTEND TIME FOR FILING MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT AND CONTINUE CASE MANAGEMENT CONFERENCE. In compliance with Civil Local Rule 5-1, I hereby attest that Angela E. Kleine concurred in this filing.

Dated: October 17, 2016

/s/ John G. Albanese

John G. Albanese

Attorney for Plaintiffs